

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

SHERRI HAYES  
Plaintiff,

v.

WAL-MART STORES TEXAS, LLC  
Defendant.

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Civil Action No. 3:20-cv-00502-M

**PLAINTIFF'S MOTION FOR LEAVE TO  
PROCEED WITHOUT LOCAL COUNSEL**

TO THE HONORABLE BARBARA M. G. LYNN:

COMES NOW Plaintiff SHERRI HAYES and files her Motion for leave to Proceed without Local Counsel, and would respectfully show the court as follows:

1. This matter was filed on January 24, 2020 in the District Court of Johnson County. Defendant filed its Original Answer on February 21, 2020. On February 27, 2020, Defendant removed this case to the Northern District of Texas, Dallas Division.

2. Plaintiff's counsel of record, Sean Palavan, resides and maintains an office in Houston, Texas, which is not in the same district as this Court. Nevertheless, Plaintiff's counsel has familiarized himself with the Local Rules of the Northern District of Texas, and he fully intends to fulfill all duties expected by this Court as contemplated by Local Rule 83.10.

3. Plaintiff's counsel is familiar with Federal Court procedures. Moreover, barring conflicts, Mr. Palavan can readily appear in this Court upon one day's notice for morning hearings or the like. Mr. Palavan has been licensed in Texas since 2008, and is currently admitted to practice in the United States District Court, Northern District of Texas. Mr. Palavan is familiar with Federal practice, having appeared before Courts in many of the Federal districts across the state. Mr. Palavan is also admitted to practice in the Southern District of Texas and Western District of Texas.

4. Mr. Palavan is in good standing in all jurisdictions in which he is admitted.

5. In light of the foregoing, Plaintiff respectfully requests that she be granted leave to proceed without local counsel. If further information or representations are necessary, Plaintiff is prepared to supplement this Motion upon request from the Court.

**PRAYER**

For the reasons cited, Plaintiff respectfully prays that the Court allow her to proceed without designating local counsel.

Respectfully submitted,

**TALABI & ASSOCIATES, P.C.**

By: /s/ Sean Palavan  
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**CERTIFICATE OF CONFERENCE**

I hereby certify that on May 14, 2020, I conferred with Stacy Bruce, counsel for Defendant, and she indicated that she did not oppose this motion.

By: /s/ Sean Palavan  
Sean Palavan

**CERTIFICATE OF SERVICE**

I hereby certify that on June 17, 2020, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all attorneys of record.

/s/ Sean Palavan

Sean Palavan